

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 10/15/18

-----X
MOLLY GREEN, on behalf of herself and all others
similarly situated,

Plaintiff,

-against-

HUMANA AT HOME, INC, d/b/a SENIORBRIDGE
FAMILY COMPANIES, INC.

Defendant.
-----X

Civ. No.: 16-cv-07586 (AJN)

STIPULATION REGARDING DOCUMENT PRODUCTION

WHEREAS the parties entered into a case-handling stipulation, which was so ordered by the Court (Dkt. 61, "Stipulation");

WHEREAS Plaintiff has requested additional discovery, Defendant has disputed the appropriateness of such discovery, and the parties have conferred regarding same, including Defendant's production of documents and Plaintiff's request for further documents including privileged documents;

It hereby is STIPULATED AND AGREED, by and between Plaintiff and Defendant as follows:

1. Without waiver of any applicable privilege, including as to any other document, Defendant shall produce the 11 documents on its Privilege Log identified by Plaintiff's counsel in correspondence dated September 20, 2018. This production is expressly based on Plaintiff's representation that she shall not seek any further document production (other than specific, non-privileged documents identified by Ms. Driscoll in her deposition, to be conducted as noted below) nor seek further

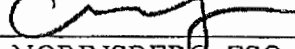
waiver of the attorney-client or work product privilege. To the maximum extent permitted by law, Plaintiff shall introduce such documents in the above proceeding confidentially and under seal;

2. Plaintiff's application for further documents is withdrawn with prejudice, and, subject to the Court's discretion, the case management conference scheduled for October 23, 2018 is adjourned, *sine die*;
3. Ms. Driscoll shall appear for deposition as previously noticed on a mutually convenient date on or before November 20, 2018. Plaintiff shall not seek to depose any additional witnesses;
4. Remaining briefing on the parties' pending motions for summary judgment and Plaintiff's motion for class certification shall be completed as follows:
 - Plaintiff's opposition to Defendant's motion for summary judgment and reply in support of Plaintiff's motion for summary judgment: December 5, 2018;
 - Defendant's reply in support of Defendant's motion for summary judgment: December 19, 2018;
 - Defendant's opposition to Plaintiff's motion for class certification (Dkt. 51, 52): December 19, 2018;
 - Plaintiff's reply in support of her motion for class certification: December 28, 2018.

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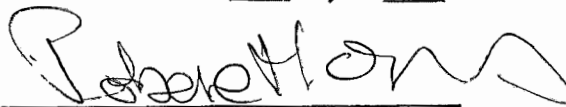
By: 
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By: 
NOEL P. TRIPP, ESQ.
DAVID R. GOLDER, ESQ.

Dated: 10/12/2018

Dated: 10/12/18

SO ORDERED on this 15th day of Oct, 2018


United States Magistrate Judge